

SUSAN WADE and
JEFFREY REID MEADOWS, JR.,

Plaintiffs,

v.

AMERICAN NATIONAL
LIFE INSURANCE COMPANY

Defendant.

Case No. _____

Defendant American National Insurance Company (incorrectly named “American National Life Insurance Company” in the original action) submits this Notice of Removal of this action from the Chancery Court for Davidson County, Tennessee, where it is now pending, to the United States District Court for the Middle District of Tennessee. Defendants respectfully show the Court as follows:

1. On September 2, 2016, plaintiffs Jeffrey R. Meadows, Jr. and Susan Wade filed a complaint against defendant in the Chancery Court for Davidson County, Tennessee, the case being styled *Susan Wade and Jeffrey R. Meadows, Jr. v. American National Life Insurance Company*, Civil Action Number 16-0983-III.

2. Defendant was served with process via the Commissioner of Insurance on September 23, 2016. Thus, this Notice of Removal is timely filed. *See* 28 U.S.C. § 1446(b)(“The notice of removal of a civil action or proceeding shall be filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based . . .”).

4. All of the pleadings and papers filed in the Davidson County action are attached hereto as collective Exhibit A. See 28 U.S.C. § 1446(a) (A defendant or defendants desiring to remove any civil action from a state court shall file “a copy of all process, pleadings, and orders served upon such defendant or defendants in such action.”). No other process, pleadings, or orders have been served upon or filed by defendants, and there have been no further proceedings in the Chancery Court for Davidson County, Tennessee as of this date.

5. This Court has original subject matter jurisdiction over this action under 28 U.S.C. § 1332(a)(1) because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and because complete diversity of citizenship exists. American National Insurance Company is a Texas corporation with its principle place of business in Galveston, Texas. (Complaint ¶ 3). Susan Wade and Jeffrey Reid Meadows, Jr. are residents of Tennessee. (*Id.* ¶1-2).

6. Venue for this action is proper in this Court as the district and division embracing the location wherein the state action is pending. See 28 U.S.C. § 1441(a).

7. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being filed with the Chancery Clerk and Master for Davidson, County, Tennessee and served on plaintiffs.

WHEREFORE, defendants remove the above-captioned case from the Chancery Court for Davidson County, Tennessee to this Court.

Respectfully submitted,



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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been mailed and/or faxed, this 7th day of October, 2016, to:

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Todd C. McKee